

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

J&J Sports Productions, Inc.

Plaintiff,

VERIFIED ANSWER

-against-

Case No.: 10-civ-2957

Victor Jose Osorio, et al,

Defendants.

Defendants, individually and as an officer, director, shareholder and/or principal by their attorneys, Joseph A. Altman, P.C. , as and/or their answer to the Plaintiff's Complaint, sets forth and alleges the following:

1. Denies each and every allegation contained in paragraphs of the Complaint marked, numbered, and designated "13", "14", "20", "22", "23", "24", "25", "29", "30", "31" and "32".
2. Lacks sufficient knowledge and information to form a belief as to each and every allegation contained in paragraphs of the Complaint, marked, numbered and designated "1", "2", "3", "4", "5", "6", "7", "8", "9", "10", "11", "16", "17", "18", "19", "21", "27" and "28".
3. Defendants hereby incorporate by reference all of the allegations contained in paragraphs 1-2 above mentioned, as though set forth herein at length, as to each and every allegation contained in paragraphs of the Complaint, marked, numbered and designated "15" and "26".

AS AND FOR A 1ST AFFIRMATIVE DEFENSE

4. That any claim or cause of action against these Defendants is improper, as the Plaintiff failed to annex the various documents and contracts to its Complaint, upon which it bases its claim and cause of action.

AS AND FOR A 2ND AFFIRMATIVE DEFENSE

5. That the individual Defendants are shielded by the "Corporate Veil" of the Corporate Defendant(s).
6. That the Plaintiff has failed to state and to set forth a claim with regard to piercing the Corporate Veil.

AS AND FOR A 3RD AFFIRMATIVE DEFENSE

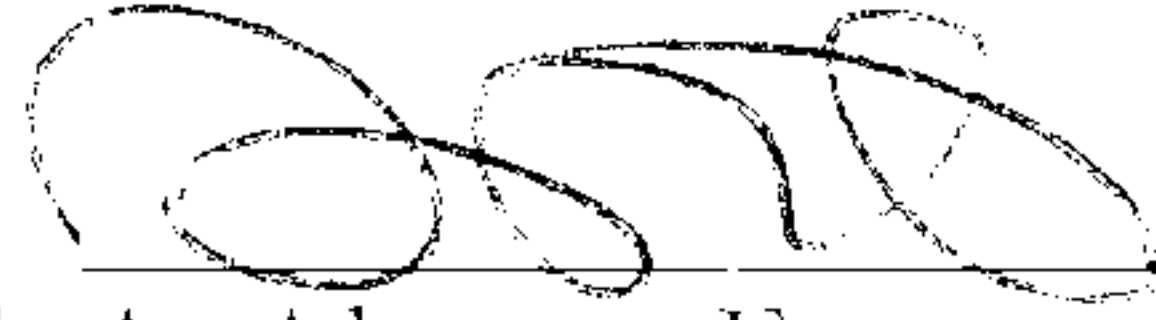
7. That the Plaintiff has failed to set forth a claim or cause of action against these answering Defendants, upon which any type of relief can be granted.

AS AND FOR A 4TH AFFIRMATIVE DEFENSE

8. That the Plaintiff, knowing and voluntarily provided the Defendant(s) with the services herein and cannot now complaint or bring suit, with the Plaintiff having waived any such claim and/or cause of action.

WHEREFORE, these answering Defendant(s) demand Judgment dismissing the within Action with costs and an assessment of reasonable legal fees against the Plaintiff re the defense of this action.

Dated: Bronx, New York
May 22, 2010

By: 
Joseph A. Altman, Esq.
Attorney for Defendant
Victor Jose Osorio, et al
Joseph A. Altman, P.C.
951 Bruckner Blvd., 1st Floor
Bronx, New York 10459
(718) 328-0422

TO: Lonstein Law Office P.C.
Attorneys for Plaintiff
1 Terrace Hill
P.O. Box 351
Ellenville, New York 12428

STATE OF NEW YORK, COUNTY OF BRONX

SS:

I, the undersigned, an attorney admitted to practice in the courts of New York State,

certification certify that the within
by Attorney has been compared by me with the original and found to be a true and complete copy.
Attorney's state that I am
affirmation the attorney(s) of record for
 action; I have read the foregoing
 to my knowledge, except as to the matters therein
 alleged to be on information and belief; and as to those matters I believe it to be true.
 The reason this verification is made by me and not by

in the within
 and know the contents thereof; the same is true

The grounds of my belief as to all matters not stated upon my own knowledge are as follows:

I affirm that the foregoing statements are true, under the penalties of perjury.

The name signed must be printed beneath

DATED:

STATE OF NEW YORK, COUNTY OF BRONX

SS:

I, the undersigned, being duly sworn, depose and say:

individual in the action; I have read the foregoing
verification and know the contents thereof; the same is true to my own
 knowledge, except as to the matters therein stated to be alleged on information and belief,
 and as to those matters I believe it to be true.
X corporation the of
verification a corporation and a party in the within action; I have
 read the foregoing VERIFIED ANSWER know the contents thereof; the same is true to my knowledge, except as to the matters
 therein stated to be alleged upon information and belief; and as to those matters I believe it to be true. This verification is made by me
 because the above party is a corporation and I am an officer thereof.

The grounds of my belief as to all matters not stated upon my own knowledge are as follows:

Sworn to before me on the 22 day of May, 2010, at Notary Public, State of New York
JOSEPH ALTMAN
No. 4805116
Qualified in Westchester County
Term Expires July 31, 2010
 The name signed must be printed beneath
Victor J. Osorio

STATE OF NEW YORK, COUNTY OF Bronx

I, the undersigned, being sworn, say: I am not a party to the action, am over 18 years of age and reside at

The undersigned Attorney and Counsellor-at-law, duly admitted to practice law in the Courts of the State of New York, affirms,
 under the penalty of perjury that:

On 5/25/10 I served the within VERIFIED ANSWER
X service by depositing a true copy thereof enclosed in a post-paid wrapper, in an official depository under the exclusive care and
by mail custody of the U.S. Postal Service within the New York State addressed to

Personal by delivering a true copy of each personally to each person named below at the address indicated. I know
service on each person served to be the person mentioned and described in said papers as a party therein.
an individual
Service by by transmitting a copy to the following persons by FAX at the telephone number set forth after each name below
electronic E-Mail address set forth after each name below, which was designated by the attorney for such purpose,
means and by depositing a true copy thereof enclosed in a post-paid wrapper, in an official depository under the exclusive care and custody
 of the U.S. Postal Service within the New York State to the address set forth after each name.
Overnight by dispatching a copy by overnight delivery to each of the following persons at the last known address set forth after
Delivery each name below.
Service

Lonstein Law Office P.C.
 Attorneys for Plaintiff
 1 Terrace Hill
 P.O. Box 351
 Ellenville, New York 12428

Sworn to before me on
 the 25 day of May, 2010

Affirm on the
25 day of May, 2010

Joseph A. Altman
 Notary Public, State of New York
 No. 4805116
 Qualified in Westchester County
 Certificate Filed in Bronx County
 Commission Expires July 31, 2010

Joseph A. Altman
 the name signed must be printed beneath

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

J&J Sports Productions, Inc.
Plaintiff,

-against-

Case No.: 10-cv-2957

Victor Jose Osorio, et al,
Defendants.

VERIFIED ANSWER

Joseph A. Altman, P.C.
Attorney(s) for
Defendants
951 Bruckner Blvd., 1st Floor
Bronx, N.Y. 10459
(718) DA8-0422

Service of a copy of the within
is hereby admitted.

TO:

Dated:

Attorney(s) for

PLEASE TAKE NOTICE:

☐ **NOTICE OF ENTRY**
that the within is a (certified) true copy of a
duly entered in the office of the clerk of the
within named court on

Dated:
Yours, etc.
Attorney for

Joseph A. Altman, P.C.
951 Bruckner Blvd., 1st Floor
Bronx, N.Y. 10459

☐ **NOTICE OF SETTLEMENT**
that an order of which the within
is a true copy will be presented to the
Hon. one of the judges of the
within named Court, at
on at M.

Dated:
Yours, etc.
Attorney for

Joseph A. Altman, P.C.
951 Bruckner Blvd., 1st Floor
Bronx, N.Y. 10459

ATTORNEY'S CERTIFICATION

JOSEPH A. ALTMAN, ESQ. , an attorney duly admitted to the Courts of the state of New York, hereby certifies that the annexed VERIFIED ANSWER is to the best of my knowledge and upon information and belief, formed after an inquiry reasonable under the circumstances, that the presentation of said papers or contentions therein are not frivolous as defined in subsection (c) of section 130-1.1 of 22 NYCRR.